



## J. NEEDS OF PUBLIC HOUSING

### Public Housing Strategy

DHCD will continue to partner with the DC Housing Authority (DCHA) in redevelopment of Public Housing sites through the HOPE VI Program and the District's New Communities Initiatives.

The HOPE VI Program redevelopment of Frederick Douglass/Stanton Dwellings, renamed Henson Ridge, calls for a new, 600-unit community with all new infrastructure (streets, sidewalks and alleys), a new community center, new parks and open spaces, as well as significant investment in neighborhood schools. The development includes 320 homeownership units targeted to households with a range of incomes. The 280 rental units will serve a mix of public housing and moderate-income families. The housing mix also includes 42 senior bungalows, 28 stacked-flat apartments and 530 townhouses.

The New East Capitol HOPE VI project, renamed Capitol Gateway Estates (formerly East Capitol Dwellings and Capitol View Plaza along with a HUD-foreclosed property) originally was to include 555 units of newly constructed mixed-income units. One hundred ninety-six units were to be public housing, 214 affordable and market rate rental units and 145 homeownership units, utilizing both lease-to-purchase and Section 8 home ownership rules - thus ensuring home ownership for a number of current residents. However, DCHA recently acquired Capitol View Plaza II from the Federal Housing Administration and has developed a new redevelopment plan for Capitol Gateway Estates that received final approval from HUD. The new redevelopment plan, with a total 761 units, includes 152 units of senior housing, 221 tax credit housing units, 177 market rate units, and 211 units of public housing replacement.

DHCD is also underwriting \$5,000,000 of CDBG funding for the following public housing sites to support pre-development and site infrastructure expenses:

1. Eastgate HOPE VI - \$2,500,000
2. Arthur Capper HOPE VI - \$500,000
3. Oak Street Apartments Rehab - \$1,000,000
4. Williston Apartments Rehab - \$500,000 and
5. Highland Dwellings Redevelopment - \$500,000.

Spending on these five projects will proceed during DHCD's FY2007 and continue into FY2008. The last of the Capital Improvement Program (CIP) spending authorized for the projects will occur at the beginning of DHCD's FY2008.

The District's New Communities initiative is aimed at interrupting cycles of joblessness, crime, and physical deterioration that are commonly found in public housing by re-building the physical, educational, social and economic underpinnings of an entire geographic area, with the participation of the local residents, the business community, and District government. The goal is to retain current public housing residents while bringing in new residents in a mixed-income environment. The first four neighborhoods selected are Northwest One, Barry Farm, Lincoln Heights, and Park Morton.



DHCD will also work with the DCHA in its outreach efforts under the American Dream Down-payment Initiative (ADDI) to bring homeownership opportunity to public housing residents. DHCD circulates its draft Action Plan to the D.C. Housing Authority for comment and coordination, and also includes DCHA's resident councils in its mailing lists for hearings and comment.

### **Housing Choice Voucher Program (formerly Section 8)**

The District of Columbia Housing Authority (DCHA) administers the District's Housing Choice Voucher Program (HCVP), formerly known as Section 8. This rental assistance program increases affordable housing choices for very low-income households by allowing families to choose privately owned rental housing. A family is free to choose any private rental unit located in the District of Columbia that meets HUD's Housing Quality Standards (HQS) and has a reasonable rent as compared to other units in the area.

The HCVP has been operating in the District of Columbia for over a decade, and more than 10,300 families are receiving assistance through various housing assistance programs. Unlike the public housing, which subsidizes the construction and operation of housing developments for the poor, the Housing Choice Voucher Program supplements what low-income families and individuals can afford to pay for housing in the private market. Thus, tenant-based assistance enables recipients to choose moderately priced housing based on the type and location that best meet their needs.

The HCVP is administered by the housing authority under contract with the federal government. Participants generally contribute 30 percent of their monthly income toward housing costs, with the housing choice voucher program making up the difference—up to a locally defined "payment standard."

Today, about 1.4 million households nationwide participate in the Housing Choice Voucher Program. National analysis of neighborhood characteristics for participants in different federal housing programs has found that Housing Choice Voucher Program vouchers reduce the probability that families will live in the most economically and socially distressed areas. Thus, HCVP tenant-based assistance effectively addresses some of the most serious shortcomings of traditional, project-based housing programs.

DCHA's HCVP will continue to commit an enormous amount of its resources to making sure its clients are provided with the option to move into stable communities with good schools, transportation, public services, and employment opportunities.



## K. ANTIPOVERTY STRATEGY

DHCD is not the lead agency in the District's direct efforts to reduce poverty, and the HUD entitlement program funds administered by DHCD are not the primary source of funds for anti-poverty activity by the District. However, by funding housing for extremely low, very-low and low-income residents, DHCD contributes to the City's anti-poverty strategy by lifting families out of poverty and providing them with stable lodging and a means to build equity for the future. DHCD also supports other DC Government initiatives in reducing poverty and utilizes its federal and local funds to help residents improve their financial stability through housing and financial counseling programs conducted by a network of non-profits. DHCD also provides funds to Community Based Organizations (CBO) to assist small businesses with technical assistance and to improve their physical appearance to retain and expand neighborhood job opportunities.

Other agencies play the key roles in the reduction of poverty. The Department of Human Services administers income support, welfare to work and a range of programs to support families and individuals. The Community Partnership for the Prevention of Homelessness provides emergency support from ESG funds to prevent eviction. The Office on Aging provides support services to seniors and partners with DHCD in the development of senior housing.

The Department of Employment Services (DOES) provides extensive job training opportunities through its city-wide "One Stop Service Centers." The Workforce Investment Council (WIC) brings together private and public sector stakeholders to develop strategies to increase employment opportunities for DC residents and to support and to assist DOES in its employment mission. The DC Public School Administration has created career-oriented high schools in a number of specialized areas, including the Technology and Hospitality Industries to facilitate students progressing from school to real jobs in the DC market.

In FY2008, DHCD will continue to play an important role in the District's new set of anti-poverty initiatives that directly target neighborhoods with high poverty and crime rates. The New Communities Initiative and the Great Streets Initiative are being planned to address both physical and socio-economic-educational needs of the targeted areas—by combining government resources with those of private and non-profit developers or organizations to bring long-term and comprehensive revitalization to the designated area. "New Communities" is a comprehensive partnership to improve the quality of life for families and individuals living in distressed neighborhoods. The companion program, "Great Streets" is a strategy to revive the local commercial corridors bordering the new communities so that the balance of services that neighborhoods need are restored along with the housing and social fabric.

These two initiatives are an aggressive approach to fighting poverty that includes current residents and businesses in the planning for an inclusive neighborhood that attracts a mixture of incomes and families, singles, and elders into the revitalized neighborhoods.





## L. LEAD-BASED PAINT HAZARDS

DHCD is committed to producing affordable housing that is free from lead-based paint hazards in all of its development programs. Since 2002, DHCD has revised protocols for all single family and multi-family housing development programs to ensure that these programs comply with the Lead-Safe Housing Rule (24 CFR 35). DHCD requires that lead-based paint (LBP) hazards be addressed in every project it undertakes involving an existing residential building. DHCD's multi-family and single family housing project development operations finance approximately 2,000 units of rehabilitated housing each year, and DHCD's commitment to lead safety requires that all of those housing units be rendered lead-safe by the completion of the construction phase of development.

Implementing DHCD's adaptation of the Lead-Safe Housing Rule involves approving and/or monitoring the full range of lead-hazard reduction activities, e.g., disclosure verification, risk assessment completion, lead scope-of-work development, finance for the lead-based paint reduction work, construction inspection, and verification of clearance. Once clearing testing is complete, the D.C. Department of Health (DOH) reviews the particular project and issues a Certification of Lead-Based Paint Compliance to the property owner. DHCD has developed a partnership with the DC Department of Health and our Department's housing partners for implementation of the Rule.

In addition to what are now routine requirements for lead safety in all DHCD housing rehabilitation activities, DHCD is also administering both a Lead Hazard Control Grant and a Lead Hazard Reduction Demonstration Grant, awarded in 2003 on a competitive basis from HUD's Office of Healthy Homes and Lead Hazard Control. These grants provide \$5 million in funding for DHCD's Lead Safe Washington Program (LSW), which reduces lead-based paint hazards in housing built before 1978 that is occupied by or available for occupancy by low-income (< 80% Area Median Income) households with children under the age of 6 years. The products and services to be delivered across both grants include:

- ❑ Lead-based paint hazard risk assessment in 500 housing units;
- ❑ Lead-based paint hazard control in 400 housing units;
- ❑ Community education on lead safety;
- ❑ Training in lead-safe work practices for District residents in the home repair and lead-based paint hazard abatement trades; and
- ❑ The hosting of an annual conference that brings together health organizations, lead-based paint abatement contractors, government agencies, and other entities involved in lead safety and children's health.

DHCD is working in partnership with the District's Departments of Health (DOH), Environment (DDOE), and Consumer and Regulatory Affairs (DCRA) to provide a seamless system of: (1) identification of lead hazards in residential property; (2) enforcement actions against property owners, where applicable; and (3) opportunities for property owners to finance lead hazard control activities. Beginning in August 2006, the District's City Administrator appointed a single coordinator for all District programs dealing with lead-based paint hazard. That action has been instrumental in facilitating the development of seamless actions across the District agencies noted above.



Lead Safe Washington was scheduled to produce 400 units of grant-eligible lead-safe housing by the grants termination dates of March 31, 2007. However, problems in identifying housing units that met the distinct eligibility requirements of the federal grants, coupled with difficulties in coordinating the work of multiple agencies prior to the appointment of the Lead Coordinator in 2006, resulted in significant under-performance on these two grant programs through the first two years of grant activity. As of June 30, 2006, LSW had cleared for lead safety only 48 units of housing meeting the grant eligibility criteria.

Significant management improvements implemented in 2006 resulted in a doubling of that number, to 100 units cleared, by March 12, 2007. This dramatic improvement in grant productivity, though occurring very late in the grant performance periods, has restored confidence in the ability of DHCD's Lead Safe Washington Program to produce a large number of lead-safe units in distinctly shorter time spans. On March 30, 2007, DHCD received written confirmation from HUD of a 12-month extension in the grant performance periods, to March 31, 2008, with continued full funding for both grants, thereby allowing the full complement of 400 units to be treated and cleared for lead safety.

DHCD is committed to meeting all HUD goals for lead-safe housing and expanding the District's capability for lead-safe financing even beyond HUD-financed grant opportunities. For FY2008, DHCD has submitted a District budget enhancement program for more than \$1 million in local funding, which would be used to finance a minimum of 200 additional units of lead-safe housing beyond any funded by HUD competitive grants.

**Additional Lead Intervention:**

As an accompaniment to the District's efforts to reduce lead hazards, DHCD's Single Family Residential Rehabilitation Program has been financing the replacement of the privately-owned portion of residential lead water service lines. The D.C. Water and Sewer Authority (WASA) will replace all of the District's residential lead water service lines by 2013. DHCD continues to offer its financing to eligible low-income households as they are scheduled to have the public portion of their lines replaced by WASA. Through the first quarter of FY2007, DHCD had provided funding for more than 120 service line replacements.



## **M. OTHER ACTIONS**

In FY2008, the District will take several steps to ameliorate the impacts of the current housing market, but realizes the fact that future resources will buy less in this competitive atmosphere.

The District will continue to support and use several methods to remove possible barriers to affordable housing such as: a dedicated source of local funding for housing production through its Housing Production Trust Fund (HPTF); improving programs and processes to make project funding easier and faster; targeting investment by type of project and geographically in its funding processes; using inter-agency coordination and public-private partnerships to leverage public funding; and increasing outreach and marketing of programs and funding opportunities.

DHCD will work to improve its various programs to effectively address underserved needs. The Department will continue to fund outreach and assistance programs for tenants in buildings with expiring Section 8 and/or other federal programs. Tenants will be provided information on purchase options under the District's First Right statute, comprehensive housing counseling and assistance for relocation, location of apartments, and for first-time home ownership.

DHCD will also conduct "brown-bag" lunch meetings with representatives of a cross-section of special needs advocates and service providers during the year—as well as during the Needs Hearings held to develop its Annual Action Plan. All participants will be offered DHCD assistance in using its twice-a-year RFP process to access funds for development of housing that addresses special needs populations. DHCD will work to develop a multi-agency approach that matches DHCD development dollars with human services' program dollars for providing operating funds for special needs houses and/or facilities.

### **Neighborhood Revitalization Strategies**

As part of the Five-Year Plan, DHCD continues the designation of its two Neighborhood Revitalization Strategy Areas (NRSAs): 1) Georgia Avenue NRSA; and 2) Carver Terrace/Langston Terrace-Ivy City/Trinidad NRSA.

#### **1. Georgia Avenue Neighborhood Revitalization Strategy Area**

DHCD submitted an application for designation of the Georgia Avenue Corridor as a NRSA to HUD in conjunction with the District of Columbia Fiscal Year 2000 Consolidated Plan.

DHCD extended that designation from 2006 into 2010. The city proposed to address economic development focused along the almost 5-mile corridor by approaching it as a single linear neighborhood. The Georgia Avenue Corridor has a distinct identity because it is one of the major north-to-south transportation routes connecting Maryland to downtown DC. The targeted area includes the 39 census blocks that abut Georgia Avenue from Florida Avenue, NW to Eastern Avenue, NW.

The NRSA development strategy includes job creation, housing and commercial development/rehabilitation, employment and entrepreneurial training and infrastructure improvements. A combination of projects and program activities has been identified in the NRSA supporting these initiatives to serve as the core tools for revitalizing the Corridor.



**Table 14: Georgia Avenue NRSA Performance Data**

<b>GOALS</b>	<b>OBJECTIVES</b>	<b>RESPONSIBLE AGENCIES</b>
George Avenue Marketing Program	<ul style="list-style-type: none"> <li>Attract 2 employers with job opportunities for local residents to locate along Georgia Ave.</li> </ul>	Washington, DC Marketing Center, DMPED, NCRC
Housing and Community Development	<ul style="list-style-type: none"> <li>Rehabilitate 20 single-family homes at affordable rates for current residents by 2007</li> <li>Provide loans to assist in the rehab of multi-family units at rents affordable to current residents</li> <li>Provide Lead Safe Washington Services through assessments and amelioration of lead paint in low-income homes</li> </ul>	DHCD, DCHA, DCHFA
Small Business Development Center	<ul style="list-style-type: none"> <li>Provide entrepreneurial training to promote the retention and expansion of local businesses</li> <li>Provide small business management training</li> <li>Provide counseling to help prepare local residents for homeownership</li> </ul>	DHCD, DC Chamber of Commerce Foundation, DC Main Street Program
Sidewalk and Infrastructure Improvements	<ul style="list-style-type: none"> <li>Resurface/redevelopment of sidewalks and infrastructure, including façades, to improve the appearance and safety of the commercial node.</li> </ul>	DDOT DHCD
Acquisition and Redevelopment	<ul style="list-style-type: none"> <li>Acquire vacant and abandoned property along the corridor for redevelopment purposes</li> </ul>	NCRC, DHCD, DCHFA, Home Again Program

## 2. Carver Terrace/Langston Terrace/Ivy City/Trinidad NRSA

DHCD applied to HUD for the designation of the Carver/Langston Terrace/Ivy City/Trinidad (CLTICT) communities as a NRSA in August 2000 for a period of five years. DHCD will extend that designation from 2006 into 2010. The CLTICT NRSA includes five census tracts defined by New York Avenue, Florida Avenue and Bladensburg Road, and includes Galludet University and the Farmer's Market, as well as major residential and light industrial developments.

The NRSA development strategy includes job creation, housing development, employment and entrepreneurial training, and infrastructure development. A comprehensive set of projects and programs has been developed around these four areas to serve as the core tools for revitalizing the neighborhood over the next five years.

**Table 15: Carver, Langston, Ivy City, Trinidad NRSA Performance Data**

<b>GOALS</b>	<b>OBJECTIVES</b>	<b>RESPONSIBLE AGENCIES</b>
Housing and Community Development	<ul style="list-style-type: none"> <li>Increase homeownership opportunities for 50 new home- owners by 2010</li> <li>Provide assistance under the single-family residential rehab program and improve other 1-4 unit properties</li> </ul>	DHCD, Home Again Program





## M. OTHER ACTIONS

GOALS	OBJECTIVES	RESPONSIBLE AGENCIES
	<ul style="list-style-type: none"><li>• Provide Lead Safe Washington Services in Ivy City/Trinidad through assessments and amelioration of lead paint in low-income units</li></ul>	
Employment and Entrepreneurial Training	<ul style="list-style-type: none"><li>• Training and employment for 100 local residents by 2010 to help them prepare for the job market</li><li>• Conduct two career fairs each year</li></ul>	DOES, NSI
Infrastructure Improvements	<ul style="list-style-type: none"><li>• Improvements to two community parks in the area</li><li>• Construction of the Trinidad Recreation Center</li><li>• Redevelopment of Alexander Crummell School</li></ul>	DDOT, DPR, DMPED, NSI





## N. CITIZEN PARTICIPATION

The District of Columbia has an approved Citizen Participation Plan on file to ensure that citizens have the opportunity to provide feedback on the Department's programs and service, as well as assist in developing the Annual Action Plan.

Notice of the community needs assessment hearings for the FY2008 Action Plan was published in the D.C. Register and local newspapers on or about October 13, 2006. (See Table 16) DHCD conducted extensive outreach by developing and distributing information on public hearings in English and Spanish to neighborhood associations, social service agencies, local non-profits, churches, civic associations, advisory councils, District Government employees, City Council, Advisory Neighborhood Commissioners, Immigrant Communities and interested citizens.

Following the community needs assessment hearings, DHCD prepared the Draft FY2008 Consolidated Annual Action Plan. In accordance with the Citizen Participation Plan, the Draft Plan is made available for public comment via a public hearing and 30-day review period. Public notice of the hearing on the FY2008 Consolidated Annual Action Plan was published in the DC Register on February 2, 2007 and in local newspapers the week of February 5, 2007. (See Appendix G) The plan was made available to the public for review and comment on February 9, 2007. Documents were available for review at public libraries, community-based organizations, on-line at DHCD's website, and at the Department's headquarters, which is convenient to both METRO rail and bus service. All hearing sites are also accessible by METRO Rail and bus service. Sign language and Spanish translation services are also provided.

Following this process, DHCD submits the documents to the Council of the District of Columbia for further comment and public hearing. Once approved by the Council, the FY2008 Action Plan is submitted to the U.S. Department of Housing and Urban Development (HUD) no later than August 15, 2007.

Below is the schedule of meetings to elicit community information on the Plan's priority needs.

**Table 16: Schedule of Community Needs Assessment Hearings:**

<b>Date/Time</b>	<b>Meeting Location</b>
Tuesday, Oct. 31 <sup>st</sup> @ 12:30 p.m.	DHCD, 801 N. Capitol St. NE (Homeless & Special Needs Meeting)
Thursday, Nov. 2 <sup>nd</sup> @ 6:30 PM	Greater. Mt. Calvary Holy Church Family Life Center, 605 Rhode Island Ave. NE
Thursday, Nov. 9 <sup>th</sup> @ 6:30 PM	Marshall Heights Community Development Org., 3939 Benning Road, NE
Tuesday, Nov. 14 <sup>th</sup> @ 6:30 PM	Matthews Memorial Baptist Church, 2616 MLK Ave., SE
Thursday, Nov 30 <sup>th</sup> @ 6:30 PM	Metropolitan Police Dept., Regional Operations Command North, 801 Shepherd St., NW

### Public hearings

- March 14, 2007- DHCD Action Plan /Budget Hearings
- April 19, 2007- Council Budget Hearing,
- May-June, 2007-TBD Council Action Plan Hearing





## O. CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing --** The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan --** It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace --** It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - (a) The dangers of drug abuse in the workplace;
  - (b) The grantee's policy of maintaining a drug-free workplace;
  - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:

## O. CERTIFICATIONS

- (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

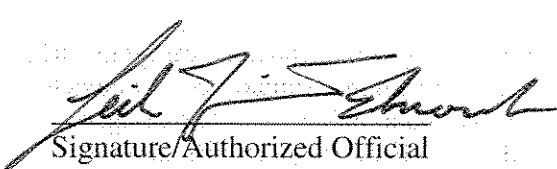
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

  
Date

Director, DHCD

Title



## Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including Section 108 guaranteed loans during program year(s), (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.



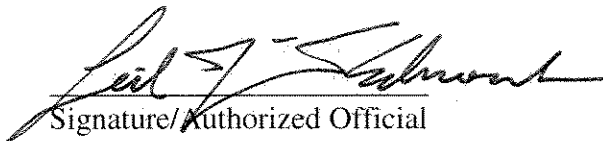
**Excessive Force** -- It has adopted and is enforcing:

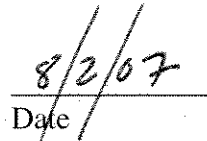
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-Discrimination Laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature/Authorized Official

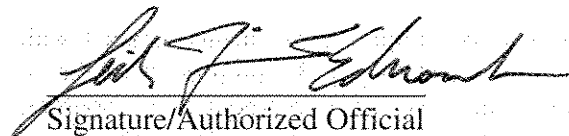
  
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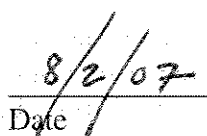
Director, DHCD  
Title

#### OPTIONAL CERTIFICATION CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature/Authorized Official

  
Date

Director, DHCD  
Title

**Specific HOME Certifications**

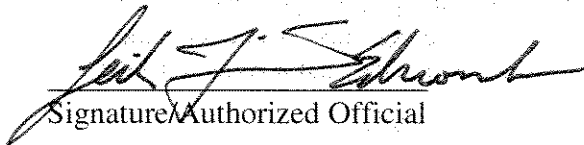
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
Signature/Authorized Official

8/2/07  
Date

Director, DHCD  
Title